

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

DRY BULK SINGAPORE PTE. LTD.)	
)	
Plaintiff,)	
)	Case No.: 2:19-cv-444
v.)	
)	Electronically Filed
M/V ETERNITY SW (IMO 9425851))	
her engines freights, apparel)	
appurtenances, tackle, etc., <i>in rem</i> ,)	
)	
Defendant)	
)	
DONG LIEN MARITIME S.A. PANAMA)	
)	
Claimant)	

**PLAINTIFF'S MOTION FOR CLARIFICATION, RECONSIDERATION AND TO REDUCE
THE AMOUNT OF COUNTER SECURITY AND REQUEST FOR EXPEDITED HEARING
PURSUANT TO ADMIRALTY RULE E(4)(f)**

COMES NOW, Plaintiff Dry Bulk Singapore Pte, Ltd. ("Dry Bulk"), by counsel, and moves this honorable court to a) reconsider the requirement for Dry Bulk to pay charter hire in the amount of \$513,720.00 directly to Dong Lien Maritime S.A. Panama ("Dong Lien") before Dong Lien is required to post its bond in the amount of \$2,000,000 for the release of the M/V ETERNITY SW from its current arrest pursuant to Supplemental Rule C; b) re-consider the actual maximum amount of the lien Claimant, Dong Lien, is entitled to assert in this matter by way of counter-claim or otherwise in the amount of \$316,631.34; and, c) adjourn the Friday, August 30th 12 o'clock Court imposed deadline for Dry Bulk to post counter-security in order to maintain the arrest of the Vessel for security purposes. (*See Order (Doc No. 17) dated August 29, 2019*) for reasons more fully outlined in Dry Bulk's accompanying Memorandum.

Dated: August 29, 2019

Respectfully submitted,

/s/

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Pro Hac Vice Forthcoming

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Memorandum in Support of Plaintiff's Motion in reconsider and reduce counter security through cm/ECF to all counsel of record in accordance with the Federal Rules of Civil Procedure on this 29th day of August:

/s/

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